

EXHIBIT B



1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3

4 LYNNE FREEMAN, an individual,)
5 Plaintiff,)
6 vs.) Case No.
7 TRACY DEEBS-ELKENANEY P/K/A) 1:22-cv-02435-AT
8 TRACY WOLFF, an individual,)
9 EMILY SYLVAN KIM, an)
10 individual, PROSPECT AGENCY,)
11 LLC, a New Jersey limited)
12 liability company, ENTANGLED)
13 PUBLISHING, LLC, a Delaware)
14 limited liability company,)
15 HOLTZBRINCK PUBLISHERS, LLC)
D/B/A MACMILLAN, a New York)
limited liability company, and)
UNIVERSAL CITY STUDIOS, LLC, a)
Delaware limited liability)
company,)
Defendants.)
_____)

16

17

18 CONFIDENTIAL

19 REMOTE VIDEOTAPED DEPOSITION OF

20 TRENT BAER

21 TUESDAY, MARCH 21, 2023

22

23

24

25 Reported in Stenotype by:
Cody R. Knacke, RPR, CSR No. 13691
Job No.: 886197

1 REMOTE VIDEOTAPED DEPOSITION OF TRENT BAER,
2 taken before Cody R. Knacke, RPR, CSR No. 13691, a
3 Certified Shorthand Reporter for the State of
4 California, commencing on Tuesday, March 21, 2023,
5 at 9:01 a.m., Pacific time.

6
7 (All Appearances Via Videoconference.)

8 APPEARANCES OF COUNSEL:

9 For the Plaintiff Lynne Freeman:

10 DONIGER/BURROUGHS
11 BY: STEPHEN DONIGER, ESQ.
12 603 Rose Avenue
13 Venice, California 90291
14 310.590.1820
15 stephen@donigerlawfirm.com

16 CSREEDER
17 BY: MARK PASSIN, ESQ.
18 1766 Wilshire Boulevard, Suite 1470
19 Los Angeles, California 90025
20 310.861.2475
21 mark@csrlawyers.com

22 For the Defendants Tracy Deebs-Elkenaney p/k/a
23 Tracy Wolff, Entangled Publishing, LLC,
24 Holtzbrinck Publishers, LLC d/b/a Macmillan,
25 and Universal City Studios LLC:

 COWAN, DEBAETS, ABRAHAMS & SHEPPARD
20 BY: BENJAMIN HALPERIN, ESQ.
 CECE COLE, ESQ.
21 41 Madison Avenue, 38th Floor
22 New York, New York 10010
23 212.974.7474
 bhalperin@cdas.com
 ccole@cdas.com

1 APPEARANCES OF COUNSEL: (Continued)

2 For Prospect Agency, LLC and Emily Sylvan Kim:

3 KLARIS LAW
4 BY: LANCE KOONCE, ESQ.
29 Little West 12th Street
New York, New York 10014
5 917.822.7468
6 lance.koonce@klarislaw.com

7 Also Present:

8 Rick Majewski, Videographer
9 Lynne Freeman
Tracy Wolff
Emily Sylvan

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

1 Q. I'm going to ask you a few personal
2 questions, and I apologize if they're personal in
3 nature, but I am entitled to ask them; so I'll try
4 to stay minimally intrusive here.

5 What's your age, Mr. Baer?

6 A. [REDACTED].

7 Q. What's your date of birth?

8 A. [REDACTED].

9 Q. Where do you live?

10 A. I live in Anchorage, Alaska, and I also
11 live in Santa Barbara, California.

12 Q. Do you own the property where you live in
13 Anchorage, Alaska?

14 A. Yes.

15 Q. Can you tell me the street address and town
16 of that property.

17 A. The address is [REDACTED], in
18 Anchorage, Alaska. We recently sold another
19 property there.

20 Q. Do you own the property where you live in
21 California?

22 A. Yes.

23 Q. And can you please give me the address of
24 that.

25 A. It is [REDACTED]

1 Santa Barbara, California [REDACTED].

2 Q. The properties that you have described, do
3 you own them just yourself or jointly with your
4 wife?

5 A. I own them jointly with my wife.

6 Q. How long have you lived at your current
7 residence in Alaska?

8 A. The previous residence -- we just moved
9 into this other residence because we sold the
10 residence in November.

11 Q. How long did you live at the one before,
12 the one you just sold?

13 A. That one, we lived in for -- I think it was
14 2018 that we bought it, so four years.

15 Q. Are you originally from Alaska?

16 A. I am originally from Alaska.

17 Q. So if I'm understanding correctly, you and
18 your wife split your time between California and
19 Alaska; is that correct?

20 A. Correct.

21 Q. [REDACTED] [REDACTED]

22 [REDACTED]

23 A. [REDACTED] [REDACTED] We spend a
24 good portion of the summers and sometimes part of
25 the winter in Alaska. And when it gets below --

1 40 below 0, we go to Santa Barbara.

2 Q. Sounds about right.

3 How many times a year would you say you go
4 back and forth between California and Alaska?

5 A. [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 Q. [REDACTED]

9 A. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Q. When you travel back and forth between
16 California and Alaska, how do you travel?

17 A. I was generally catching the red eye out of
18 LA on a five-hour flight direct to Anchorage.

19 Q. So these are commercial flights, not
20 private flights?

21 A. They are on Alaska Airlines, yeah.

22 Q. And is it the same for your wife?

23 A. Generally, yes. She would not take red
24 eyes, though.

25 Q. Are you currently employed, Mr. Baer?